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Long B. Nguyen
Director, Process Safety & Environmental Programs

October 28, 2021

Director, Air Enforcement Division
U.S. Environmental Protection Agency
MC 2242A
1200 Pennsylvania Ave. NW Washington,
D.C. 20460

Director of Litigation
Litigation Division,
MC-175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Director
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1201 Elm Street
Dallas, TX 75270

Division Chief
Environmental Protection Division
Office of the Attorney General of Texas
P.O. Box 12548, MC
066 Austin, TX 78711-
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Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611

**Re: Malfunction Event Notice
Tokai Carbon CB Borger Plant**

Dear Sir/Madame:

Per Provision 54 of the Consent Decree, Tokai Carbon CB hereby provides notice that the Borger Plant experienced a malfunction at the South Flue Gas Fan on October 2, 2021. The newly installed Wet Gas Acid ("WSA") scrubber system has two large fans, about 14 feet in diameter each, that move the flue gas from the Boilers into the WSA scrubber. The South Flue Gas Fan experienced a catastrophic failure on the morning of October 2nd. The fan broke apart and ripped through fan's housing. This fan was recently installed as part of the new WSA scrubber system, and it had been in operation for only about a month when this failure occurred. Plant personnel, the fan manufacturer, and contractors have performed an investigation of this incident. However, the investigation report has not been finalized because we are still waiting on the fan's metallurgical testing results from the lab.

As the result of this unexpected failure, the Borger Plant had to use Unit 3 flare as a backup control device to the boilers during the unit operation for approximately one week.

An affirmation defense will be asserted for this malfunction event in the next semi-annual compliance report per Provision 77 of the Consent Decree. Please let me know if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Long B. Nguyen', with a stylized, cursive script.

Long B. Nguyen